

UNITED STATES DISTRICT COURT
FOR
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

v.

NICHOLAS KYLE MARTINO

Defendant,

CRIMINAL NUMBER: 17-00240-001

MOTION FOR REMOVAL OF COUNSEL/APPOINTMENT OF CONFLICT COUNSEL

COMES NOW THE DEFENDANT, Nicholas Kyle Martino, Pro Se and pursuant to 28 U.S.C.A. § 3006(A), to move this Honorable Court to remove his current counsel, Christopher O'Malley, Esq. and replace him with an attorney from the conflict pool. In support of this motion, The defendant does aver the following:

1. Attorney (hereafter "O'Malley") refuses to allow the defendant to send letters of correspondance to him regarding his Federal Criminal matter, and also refuses to send any type of information to his client regarding the case at hand.
2. O'Malley refuses to speak with the defendant. Every effort made by the defendant was declined to date.
3. Some appointments that O'Malley has scheduled with the defendant has gone by without any reason in writing by counsel.
4. In light of the aforementioned statements, the defendant feels that there are unreconcilable differences between he and O'Malley.

WHEREFORE, the defendant asks for relief to be given by removing the current counsel and appointing new counsel for the duration of this case.


CERTIFICATE OF SERVICE

I, Nicholas Kyle Martino, the defendant in the attached motion for removal of counsel/appointment of conflict counsel, do hereby certify under penalty of perjury pursuant to 28 USC 1746 that I have served a true and correct copy of the motion in person to the following party(s) on this 30th day of July, 2018:

Honorable Judge Jerome B. Simandle
United States District Court
District of New Jersey
401 Market Street
Camden, NJ 08101-2098

NKA U.S. Attorney
~~Sara~~
~~Jessica~~ Aliabadi, AUSA
401 Market Street
Camden, NJ 08101-2098

Respectfully Submitted,



Nicholas Kyle Martino